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10 Attorneys for Defendant
11 EDWIN ANGULO

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE EASTERN DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 vs.
17 EDWIN ANGULO,
18 Defendant.

Case No. 1:24-cr-00069-JAM-BAM

**MOTION TO AMEND PRESENTENCE
INVESTIGATION REPORT (FINAL);
ORDER**

19 The draft Presentence Investigation Report (PSR) was filed in this matter on February 6,
20 2025. *See* ECF #30. Mr. Angulo submitted his informal objections to the draft PSR on February
21 11, 2025. *See* ECF #31-2. In his informal objections, Mr. Angulo objected to paragraph 20 of the
22 draft PSR insofar as it included the improper addition of two levels under the U.S. Sentencing
23 Guidelines § 2A6.2(b)(1)(A) for the offense involving the violation of a court protective order. *See*
24 ECF #31-2 at 2. The final PSR was filed in this matter on February 19, 2025. *See* ECF #31. On
25 February 25, 2025, Mr. Angulo filed his formal objections to the PSR and continued his objection
to the addition of two levels under § 2A6.2(b)(1)(A), still listed in paragraph 20 of the final PSR.
26 *See* ECF # 32 at 3-4.

27 At sentencing on March 11, 2025, the Court sustained the objection to paragraph 20 insofar
28 as it added an additional two levels under the U.S. Sentencing Guidelines § 2A6.2(b)(1)(A). As a
result, it is necessary to amend a number of paragraphs in the final PSR to reflect the sustained

1 objection to paragraph 20 of the final PSR. It is necessary to amend paragraph 20 to only include
2 an additional two levels of § 2A6.2(b)(1)(E) but removing the addition of two levels under
3 (b)(1)(A). It is necessary to correct paragraph 28, which lists the total offense level as 19; the total
4 offense level found by the Court at sentencing is 17. It is necessary to correct paragraph 75 which
5 details the guideline provisions; this paragraph should read that the total offense level is 17 and
6 the guideline imprisonment range is 30-37 months. It is necessary to correct the offense level and
7 the guideline provision, as well as the recommended sentence, included on page 1 of ECF # 31-1,
8 which incorrectly lists the total offense level at 19 and the guideline range as 37-46 months, as
9 well as the two references on page 2 of ECD # 31-1 listing the low-end of the guideline /
10 recommendation for imprisonment as a term of 37 months.

11 The government does not oppose modifying the PSR to reflect the above changes.

12 Respectfully submitted,

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14 HEATHER E. WILLIAMS
Federal Defender

15 Date: March 14, 2025

16 */s/ Kara R. Ottervanger* _____
17 KARA R. OTTERVANGER
18 Assistant Federal Defender
Attorney for Defendant
EDWIN ANGULO

20 **O R D E R**

21 IT IS HEREBY ORDERED that the final Presentence Investigation Report filed on
22 February 19, 2025, be **MODIFIED** in accordance with the above.

24 Dated: March 17, 2025

25 */s/ John A. Mendez* _____
26 THE HONORABLE JOHN A. MENDEZ
27 SENIOR UNITED STATES DISTRICT JUDGE